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1 Okay. So I'm just putting on the screen what is
2 marked as 1A, and so 1A --

3 MR. BELELIEU: Chris, you have that one in front of
4 you?

5 THE WITNESS: Yeah.

6 Q. (By Mr. Quainton) So the last e-mail is the same as
7 in one, but then there is an e-mail from Derek Stephenson on
8 May 3rd saying, "I actually just jumped on their site and
9 ordered."

10 MR. BELELIEU: I think the last e-mail in one is the
11 one that is down, "Hi, Derek, I hope you are doing well." So
12 if you go down, so the two e-mails at the top are new.

13 Q. (By Mr. Quainton) Okay. So let's go back. So one
14 -- so the top e-mail on one says, "I hope you're doing well.
15 I just want to follow up on the second unit."

16 And the top e-mail on 1A says, "Thanks, Derek.
17 Please send tracking once available. Also, please send me the
18 invoice, and we'll get you reimbursed ASAP."

19 So they're two separate -- 2A and one are two
20 separate chains of the last e-mail, which is on May 3rd, 2021,
21 just different times of day, right? But both of those chains
22 and -- on the most recent date in both those chains is May
23 3rd, 2021, right?

24 A. Correct.

25 Q. Okay. So just going back to PB30, so let's -- so the

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1 -- is it correct that the -- the next to last one in PB30,
2 which is from Christopher Berrett to Derek Stephenson, May
3 30th, 21 -- 2021 at 7:01 p.m., that one -- that e-mail is not
4 in either one or 1A; is that right?

5 MR. BELELIEU: That is incorrect. And you said May
6 30th. It is May 3rd.

7 MR. QUANTON: May 3rd.

8 MR. BELELIEU: That e-mail is the top of 1A.

9 MR. QUANTON: This -- so what I just read from
10 Christopher Berrett to Derek Stephenson, May 3rd, 2021, that
11 is the top of 1A?

12 MR. BELELIEU: Yes.

13 MR. QUANTON: Okay.

14 Q. (By Mr. Quainton) My question is this e-mail here
15 that is Christopher Berrett to Derek Stephenson May 25th,
16 2021, that is not in either 1A or one, correct?

17 MR. BELELIEU: Are you asking the witness, or are you
18 asking --

19 MR. QUANTON: I am asking the witness. I'm asking
20 Chris Berrett.

21 Q. (By Mr. Quainton) If you look at --

22 A. I believe so.

23 Q. If you look at the -- what I asked you to look at
24 before, the subject line "re" -- do you see where it say "re"
25 and in brackets it says "external" and the May 3rd, 2021, 7:01

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1 p.m. e-mail? Do you see that?

2 A. Yes.

3 Q. But then if you go up to the May 25th, 2021, that
4 external in brackets is no longer there. Do you see that?

5 A. Yes.

6 Q. You don't have any understanding of why there would
7 be the external -- the word external in brackets in one e-mail
8 but not in the second e-mail, do you?

9 A. I have no idea.

10 MR. BELELIEU: Eden, we can stipulate to that, so
11 clearly that external document will be on the subject line
12 because it didn't come from Amazon production. I mean, that
13 is -- we can stipulate to all of that.

14 MR. QUANTON: What I am trying to get -- what I am
15 trying to get at is why -- if the witness has any knowledge of
16 why that e-mail, which is --

17 Q. (By Mr. Quainton) You see the subject line of the
18 May 25th e-mail, "Re compensation for services"?

19 A. Yes.

20 Q. And do you see the subject line of the e-mail
21 immediately below subject, "Re external compensation for
22 services"?

23 A. Yes.

24 Q. Do you see that? So would you agree with me that the
25 subject line of the e-mail in -- at the top of PB30 is the

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1 same as the subject line of the May 3rd, 2021, 7:01 p.m.
2 e-mail?

3 A. I believe you asked me to agree with you that it is
4 the same.

5 Q. The same subject line, other than the bracketed line,
6 which is external?

7 A. Correct.

8 Q. Now, this May 25th e-mail says, "I hope you're doing
9 -- Hi Derek. I hope you're doing well. I wanted to check in
10 on this request. Our team would like to start work on this."
11 I -- I think that is probably just a typo? It should be
12 O-U-R; is that right?

13 A. Yeah, it looks like we need to spell check.

14 Q. Okay. Do you -- so do you have any recollection of
15 the -- of the individuals who composed, quote, unquote, our
16 team that would like to start work on this?

17 A. I think I am referencing the locations of the
18 engineering team at SJC and then the install team in Las
19 Vegas.

20 Q. Oh, so you think you're referring to both SJC and Las
21 Vegas when you refer to "our team"?

22 MR. BELELIEU: Objection; asked and answered.

23 THE WITNESS: Yes, it would be the same -- same
24 answer. I believe I am referring to the SJC and the team and
25 the Las Vegas team.

16 (Pages 58 to 61)

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1 Q. But you know that one device has already been sent to
2 SJC -- SJC13?

3 MR. BELELIEU: There is no question.

4 MR. QUANTON: That's a question.

5 Q. (By Mr. Quanton) Right?

6 A. I'm sorry?

7 MR. BELELIEU: It was a statement.

8 Q. (By Mr. Quanton) You know there is one -- let's
9 look down below in this e-mail. It is also the same as in
10 1A -- the e-mail from Alex to Derek Stephenson copying you
11 April 25th, 2021, Alex says, "Hi, Derek. I hope you had a
12 good weekend. I know on 3/26 you shipped one of the devices
13 to San Jos ."

14 Okay. So when Alex says San Jos , he is referring to
15 SJC13, right?

16 A. Correct.

17 Q. Okay. So when you refer -- when you say sort of a
18 month later -- a month-and-a-half-later, I wanted to check in
19 on this request. Our team would start -- would like to start
20 work on this," is it your recollection that you are referring
21 to both the GateGuard device that was already sent to Las
22 Vegas -- to Sunnysvale and the device that was to be sent to
23 Las Vegas?

24 MR. BELELIEU: Objection; asked and answer and also
25 object to the form.

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1 your request for the invoice for that second device that
2 Mr. Stephenson said on May 3rd that he just jumped on the site
3 and ordered again -- ordered another one, right?

4 MR. BELELIEU: Object to the form.

5 THE WITNESS: I believe so.

6 Q. (By Mr. Quanton) So when you say are -- so you say,
7 "I want to check in on this request," referring to the request
8 for the invoice relating to the second device, when you say,
9 "Our team would like to start working on this," you are
10 referring to the second device, not the first device, right?

11 MR. BELELIEU: Objection. Asked and answered three
12 times. If you don't like his answer, I mean, I don't know
13 what to tell you. He has answered that three times.

14 MR. QUANTON: Okay. Well, three is a charm.

15 MR. BELELIEU: Okay. Go ahead, again, Chris.

16 THE WITNESS: I don't -- I don't know what my thought
17 context was on that. That is what I was referring to. But,
18 yeah, again, our team could be install at SJC, but it's a fair
19 assumption it could be Las Vegas.

20 Q. (By Mr. Quanton) Okay. Do you recall any specific
21 individuals who had asked you to follow up on -- as of May
22 25th who asked you to follow up on either device, the one that
23 was sent to Sunnysvale or the one that was ordered for Las
24 Vegas?

25 MR. BELELIEU: Object to the form.

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1 THE WITNESS: Yes. Again, I can't be certain if I am
2 referencing both or one. I don't know. I can't say for
3 certain if I knew that work had been started at SJC or if it
4 was for sure received yet. I can't say for certain I knew
5 that at that time writing that.

6 Q. (By Mr. Quanton) Well, would you agree, wouldn't
7 you, that this May 25th e-mail appears to be a continuation of
8 the same chain that ended with May 3rd, 2021, that is also
9 identified as compensation for services, right?

10 A. Yeah, I agreed in the continuation of the entire
11 thread regarding both -- the original, you know, order of both
12 devices.

13 Q. Right. So on May 3rd when you say, "Please send
14 tracking once available," that is an e-mail that comes right
15 after an e-mail from earlier in the day at 3:39 p.m. when
16 Derek cites -- when Derek Stephenson says, "I just jumped on
17 their site and ordered another. Last time it showed up in
18 about three business days."

19 So when you say, "Please send tracking once
20 available," you are referring to the tracking for the second
21 device that Derek Stephenson said he just jumped on the site
22 and ordered, right?

23 A. I believe so.

24 Q. Okay. So when you say in the most recent e-mail, "I
25 wanted to check in on this request," you are referring back to

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1 THE WITNESS: I don't recall specific individuals.
2 You know, I was asked to do something and was following up. I
3 don't recall specific individuals.

4 Q. (By Mr. Quanton) Do you know who Paul Donovan is?

5 A. I know him as Nipper and Paul Donovan, yes.

6 Q. And have you worked with him -- have you worked with
7 him frequently over the years?

8 MR. BELELIEU: Object to the form. Lacks foundation.

9 THE WITNESS: I had been introduced to Nipper when I
10 joined the team -- early on when I joined the team. Obviously
11 he had done engineering work on the devices. And being a
12 supply chain, I think my first introduction was he wanted to
13 send some of the manufactured devices to us in Las Vegas. I
14 think that was my first introduction.

15 Over the course of the years, yeah, I have worked
16 with him. Maybe not directly on a specific project but helped
17 look at contracts or, again, facilitate if he needs to ship
18 something to us, a device that are manufactured. He works
19 with my supply chain team on some of the component stuff.

20 Q. So I wanted to follow up on what you just said. You
21 said that Mr. Donovan sent -- sends you manufactured devices
22 to Las Vegas? Did I hear that correctly?

23 A. That was my first introduction. He had the -- well,
24 he was coordinating the devices being sent from the
25 manufacture to Las Vegas.

17 (Pages 62 to 65)